

## United States District Court

DEC - 8 2018

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Margarita Escandon

PRINCIPAL

Case Number:

YOB: 1986

M-18-2512 -M

United States

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 6, 2018 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Leticia Cruz-Hernandez, a citizen and national of Mexico, and Sandra Maribel Sis-Tecu, a citizen and national of Guatemala, for a total of two (2), who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from Los Ebanos, Texas to the point of arrest near Los Ebanos, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY  
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On December 6, 2018, Border Patrol Agents responded to a camera activation showing suspected undocumented aliens near Los Ebanos, Texas. A camera operator (A1) scanned the area and observed a grey sedan park on a paved road near the camera activation. A1 then observed two subjects quickly board the sedan. Shortly after, the sedan proceeded to travel northbound on El Faro Road.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

S/ Gerardo Montalvo

Signature of Complainant

Gerardo Montalvo Senior Patrol Agent

Printed Name of Complainant

Sworn to before me

December 8, 2018 11:08 a.m.  
Date

at McAllen, Texas  
City and State

Peter E. Ormsby, U. S. Magistrate Judge  
Name and Title of Judicial Officer

*Peter E. Ormsby*  
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-18- 2512 -M**

**RE: Margarita Escandon**

**CONTINUATION:**

Agents were very close to the vehicle and immediately located the grey sedan. Agents followed the grey sedan and conducted a vehicle stop on El Faro Road. As the agents approached the occupants, they observed a passenger in the front seat and another passenger suspiciously laying down on the rear seats. The driver was identified as Margarita Escandon, a United States Citizen. Agents further questioned the front and rear passengers and determined they had just crossed the river and were both illegally present without proper documentation to remain in the United States.

All subjects were transported to the Border Patrol Station for processing.

**PRINCIPAL STATEMENT:**

Margarita Escandon was read her Miranda Rights. She understood and agreed to provide a sworn statement.

Escandon, stated that she received a call from a male subject asking if she wanted to make some money. Escandon claims she needed money for her kids and agreed. The male subject picked her up and both drove to Sullivan City, Texas. At that point, Escandon dropped off the male subject at a store and she then drove to pick up the illegal aliens. Escandon began to receive instructions through a cell phone. Escandon believed she was going to pick up five undocumented aliens. Escandon didn't know how much she would get paid.

**MATERIAL WITNESSES STATEMENTS:**

Leticia Cruz-Hernandez and Sandra Maribel Sis-Tecu were read their Miranda Rights. Both understood and agreed to provide a sworn statement.

Cruz, a citizen of Mexico, stated her uncle made the smuggling arrangements and was to pay \$3,000 USD. Cruz claims she crossed illegally into the United States on a raft along with another female subject. Cruz was told that a grey car would be waiting to pick her up. Once inside the vehicle, Cruz noticed the driver had a tattoo on her wrist.

Cruz identified Escandon, through a photo lineup, as the driver of the vehicle that picked her up.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
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**M-18- 2512-M**

**RE: Margarita Escandon**

**CONTINUATION:**

Sis, a citizen of Guatemala, stated she was crossed illegally into the United States on a raft along with a female subject and a male subject. Sis stated the male told them a grey car would pick them up and pointed them towards the vehicle after crossing. After boarding the vehicle, Sis stated she heard the driver say that they had been seen by Border Patrol and were going to be taken to jail. Sis claims she was scared so she laid down in the rear seat.

Sis identified Escandon, through a photo lineup, as the driver of the vehicle that picked her up

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FBI - McALLEN